



Charles H. Chevalier
Director

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4500
cchevalier@gibbonslaw.com

July 10, 2025

VIA ECF

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *AstraZeneca Pharm. LP v. Natco Pharma Ltd.*, Civil Action No. 3:23-796
(RK) (TJB) (Consolidated)**

Dear Judge Bongiovanni:

Our firm, together with Williams & Connolly LLP, represents Plaintiffs AstraZeneca Pharmaceuticals LP, AstraZeneca UK Limited, AstraZeneca AB, KuDOS Pharmaceuticals Limited, The University of Sheffield, and MSD International Business GmbH (collectively, "Plaintiffs") in the above-referenced matters. With Midlige Richter, LLC and Rakoczy Molino Mazzochi Siwik LLP, counsel for Defendant Natco Pharma Limited ("Natco"), and with Hill Wallack LLP and Crowell & Moring LLP, counsel for Defendant Sandoz Inc. ("Sandoz"), and with K&L Gates LLP, counsel for Defendants Cipla Limited and Cipla USA, Inc. ("Cipla"), and with Baker, Donelson, Bearman, Caldwell & Berkowitz, PC and Buchanan Ingersoll & Rooney PC, counsel for Defendants Zydus Pharmaceuticals (USA) Inc. and Zydus Lifesciences Limited ("Zydus") (collectively, "Defendants"), we write to advise the Court on the status of discovery and the parties' progress regarding the narrowing of claims and defenses. ECF No. 206.

Regarding discovery, the parties are beginning the deposition discovery process. The parties are also conferring regarding other discovery matters, and the parties will seek the Court's assistance should they reach an impasse on any of these issues. Additionally, as the Court is aware, Defendants' letter to the Court regarding a discovery dispute (ECF No. 209, 214, 217) is pending before the Court.

Regarding the narrowing of claims and defenses, the parties have been exchanging proposals but have yet to reach an agreed-upon proposal for the Court. In view of these continuing negotiations, the parties respectfully submit that by August 1, 2025 they will submit either another status report advising the Court that they have reached an agreement on claim narrowing or a joint dispute letter setting forth their respective positions.

If the Court would like to discuss any of these matters further, the parties will make themselves available at the Court's convenience. The parties thank the Court for its time and assistance in this matter.

Respectfully submitted,

GIBBONS P.C.

July 10, 2025

Page 2

s/ Charles H. Chevalier

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cc: All counsel of record (via ECF and email)